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Our File No. 27,887

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

JILL MILLER TARBET and LISA MILLER,

Plaintiffs.

VS.

MATTHEW E. MILLER; ANGELES A. ACEITUNA, a.k.a. ANGELES A. MILLER; and JOHN AND JANE DOES I-VI.,

Defendants.

MOTION FOR PROTECTIVE ORDER

Case No. 2:05-cv-00635-PGC

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the defendants, by and through counsel, hereby moves the Court for an order prohibiting the production of documents, including "[a]ny and all records, statements, documents, etc. pertaining to Matthew E. Miller; Angeles A. Aceituna; Angeles A. Miller; Elaine M. Miller; Elaine M. Miller; Elaine M. Miller Rentals; LLC.; Elaine M. Miller Properties; LLC, Lilac Management, LLC; Miller Snowboard Corporation;

Miller Ski Company, Inc.; MST Funding & Acquisitions, LLC; Matthew E. Miller, P.C.; Kai Jo Capital, Inc.; Miller Enterprises, L.L.C.; Miller Sports Technologies, Inc.; Miller Sports International, L.L.C.; McKinley Mining & Management, L.L.C.; Seventh Millennium, L.L.C.; and Pieces of Time, L.L.C. pursuant to the Subpoena provided to Wells Fargo, Attention Jeanne Walker to produce and permit inspection and copying of the all documents for the individuals and entities listed above.

A memorandum supporting this motion is filed herewith.

DATED this 12th day of November, 2005.

LESLIE W. SLAUGH, and

PHILLIP E. LOWRY, and

RICHARD L. PETERSEN, for:

HOWARD, LEWIS & PETERSEN, P.C.

Attorneys for Defendants

MAILING CERTIFICATE

I hereby certify that a true and correct copy of the foregoing was mailed to the following, postage prepaid, this _______ day of November, 2005.

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